

1 Alyssa A. Qualls (IL Bar No. 6292124)

2 Email: [quallsa@sec.gov](mailto:quallsa@sec.gov)

3 Amy S. Cotter (IL Bar No. 6238157)

4 Email: [cottera@sec.gov](mailto:cottera@sec.gov)

5 Raven A. Winters (IL Bar No. 6291077)

6 Email: [wintersr@sec.gov](mailto:wintersr@sec.gov)

7 Attorneys for Plaintiff

8 David Glockner, Regional Director

9 Robert J. Burson, Associate Regional Director

Amy S. Cotter, Assistant Regional Director

Alyssa A. Qualls, Regional Trial Counsel

Securities and Exchange Commission

175 West Jackson Blvd., Suite 900

Chicago, Illinois 60604

Telephone: (312) 353-7390

Facsimile: (312) 353-7398

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 **Northern Division**

13 SECURITIES AND EXCHANGE  
14 COMMISSION,

15 Plaintiff,

16 vs.

17 DAVID B. KAPLAN, ESQ.,

18 Honorable Marcia S. Krieger

19 SYNCHRONIZED ORGANIZATIONAL

20 SOLUTIONS, LLC,

21 SYNCHRONIZED ORGANIZATIONAL

22 SOLUTIONS INTERNATIONAL, LTD.,

23 and MANNA INTERNATIONAL

24 ENTERPRISES, INC.,

25  
26  
27 Defendants,  
28 )

Case No. 3:16-cv-00270-MMD-VPC

**Honorable Miranda M. Du**

**STIPULATION TO EXTEND TIME TO  
FILE A RESPONSE TO MOTION TO  
COMPEL SEC'S ACCOUNTING AND  
DISTRIBUTION OF FUNDS TO HARMED  
INVESTORS**

**FIRST REQUESTED EXTENSION**

1 and  
2

3 LISA M. KAPLAN,  
4 THE WATER-WALKING  
5 FOUNDATION, INC., and  
6 MANNA INVESTMENTS, LLC,

7 Relief Defendants.  
8

9 IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, as  
10 follows:

11 1. On January 18, 2024, Dean Properties, LLC, through its counsel of record, Matthew  
12 Pruitt, Esq. of Kirton McConkie, PC, filed a Motion to Compel the SEC's Accounting and  
13 Distribution of Funds to Injured Investors (hereinafter "Motion to Compel"). (ECF No. 162).

14 2. Plaintiff SEC hereby requests an additional 21 days to prepare a response to the  
15 Motion to Compel.

16 3. The SEC and counsel for Dean Properties have agreed to the 21-day extension,  
17 during which time the SEC will prepare a fair and reasonable proposed timeline for the distribution  
18 of funds to harmed investors.

19 //

20 //

21 //

1       4. Accordingly, the Parties respectfully request that the time to file a response to the  
2 Motion to Compel be extended until February 22, 2024.

3 Date: January 26, 2024

4 /s/ Alyssa A. Qualls

5 Alyssa A. Qualls (IL Bar No. 6292124)  
6 175 West Jackson Blvd., Suite 900  
7 Chicago, Illinois 60604  
8 Telephone: (312) 353-7390  
9 Facsimile: (312) 353-7398  
10 Email: [quallsa@sec.gov](mailto:quallsa@sec.gov)

11 /s/ Matthew Pruitt

12 Matthew Pruitt, Esq.  
13 301 N. 200 E., Suite 3-A  
14 St. George, Utah 84770  
15 Telephone: (435) 574-5672  
16 Email: [mpruitt@kmclaw.com](mailto:mpruitt@kmclaw.com)

17 Counsel for Plaintiff United States Securities  
18 and Exchange Commission

19 Counsel for Dean Properties, LLC.

20 IT IS SO ORDERED:

21   
22 The Honorable Miranda M. Du, Chief  
23 United States District Judge

24 Dated: January 26, 2024